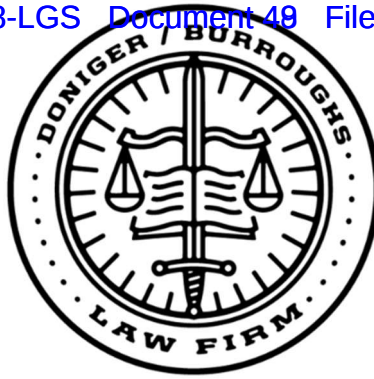


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September 12, 2018

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Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Case Name: Eric Angelini v. Studio Manhattan, LLC
Case No.: 1:18-cv-04068-LGS
Matter: List of Depositions Dates

Your Honor:

Our office represents the Plaintiff, Eric Angelini, in this matter. Plaintiff and Defendant, Studio Manhattan, have conferred as required by the Court's September 4, 2018 Order (Dkt. No. 43) and provide the following deposition dates as directed by said Order:

1. Plaintiff's Deposition – October 11 or 12 in California.
2. Defendant's Deposition – October 9 or 10 in New York.

Plaintiff has identified to Defendant an individual by the name of Rosario Archimedes. He is an artist with whom Plaintiff worked on the artwork at issue. As that person is a non-party, the parties are unable to confirm his deposition date at this time.

Defendant's position is that Defendant has also reserved the right to depose other persons yet to be identified by Plaintiff whose works, names or CMI appear on the so-called "Dream Wall."

Respectfully submitted,

As fact discovery is scheduled to conclude by October 15, 2018, any deposition notices shall be served by September 20, 2018, with the depositions to take place on or prior to the fact discovery cut-off date. SO ORDERED.
New York, New York
September 13, 2018

By: /s/ Emily Danchuk
Emily Danchuk, Esq.
DONIGER / BURROUGHS

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE